

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems)	CC Docket No. 94-102
)	

To: Chief, Wireless Telecommunications Bureau

THIRD SUPPLEMENT TO AMENDED REQUEST FOR TEMPORARY STAY

1. Southern Illinois RSA Partnership d/b/a First Cellular of Southern Illinois ("First Cellular") hereby supplements its "Amended Request for Temporary Stay" ("the Request"), filed September 4, 2002: a) at Paragraph No. 3 to include that it has now received a Public Safety Answering Point ("PSAP") request for Phase II E-911 service for Williamson County, which is in the Illinois 8 – Washington RSA; and b) to include a copy of the PSAP's letter request, dated April 21, 2003, as Attachment D to the Request.

2. This is the third PSAP request for E-911 Phase II service received by First Cellular. The first PSAP request was received from Randolph County, as stated in the Request. The second PSAP request was for Saline and Gallatin Counties, as stated in First Cellular's "Supplement to Amended Request for Temporary Stay," filed January 6, 2003. The instant supplement does not alter First Cellular's theory of relief, as stated in the Request.

3. By way of background information, the Request was filed pursuant to Section 1.3 of the Rules and the Commission's recent Order to Stay, FCC 02-210, released July 26, 2002 ("Stay Order"), and requests a temporary stay, up to and including September 1, 2003 or the date occurring six months following receipt of a valid PSAP request for

Phase II Automatic Location Identification (“ALI”) information (whichever is later), of the Rule 20.18(f) requirement that First Cellular provide Phase II service to at least 50% of its coverage area or population by the date specified in the regulation. Under the definitions set forth in the Stay Order, First Cellular is a Tier III carrier providing non-nationwide Commercial Mobile Radio Service. First Cellular intends to implement a network-based Phase II ALI solution.

4. First Cellular’s two cellular systems employ switching and base station equipment manufactured by Motorola, Inc. Subsequent to the filing of the Request, First Cellular selected TruePosition as its Phase II E-911 ALI equipment vendor based upon TruePosition’s representations that its equipment was compatible with the Motorola cellular system equipment deployed throughout First Cellular’s network. First Cellular executed the TruePosition-provided contract for the purchase and deployment of the Phase II equipment throughout First Cellular’s 24-county service area, irrespective of whether any PSAP requests for Phase II ALI service had been received. However, to date, First Cellular has not been provided with a copy of the contract executed by TruePosition. In addition, TruePosition recently advised that its Phase II E-911 ALI equipment is not compatible with the Motorola cellular system equipment, notwithstanding its prior representations to the contrary made to First Cellular. As First Cellular understands it, discussions on this issue are currently underway between TruePosition and Motorola, with a definitive answer expected soon. .

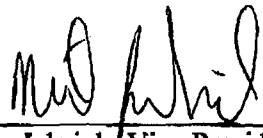
WHEREFORE, good cause shown, First Cellular requests that the requested temporary stay be granted.

Respectfully submitted,

**Southern Illinois RSA Partnership
d/b/a First Cellular of Southern
Illinois**

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Dated: ✓ 5-1-03

By: ✓ 
Mike Jaksich, Vice President
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ATTACHMENT D

Williamson Co 911

Monday, April 21, 2003

*Terry Addington and Mike Jaksich
First Cellular*

Dear Sirs,

The Williamson County Emergency Telephone System Board would like to request phase two wireless 911 service from First Cellular of Southern Illinois. We are currently providing phase one service. 911 Coordinator Ken Smith met recently with Mike Jaksich and representatives of True Position concerning the TDOA solution for phase two in our county. We had held off on this request letter until you informed us that you were ready and able to provide the service and had convinced most of the other systems in the region to do the same. You can now expect an increase in the number of request letters.

Sincerely, 

Ken Smith - Williamson Co 911 Coordinator, INENA Region 7 VP